

# Beins, Axelrod, & Keating, P.C.

1717 K Street N.W. Suite 1120  
Washington, D.C. 20006 · WWW.BEINSAXELROD.COM  
ph: 202.328.7222 · fax: 202.328.7030

Jonathan G. Axelrod  
Justin P. Keating

*Of Counsel*  
Rodney W. Harrell

April 29, 2021

Kathy Drew-King, Regional Director  
National Labor Relations Board Region 29  
100 Myrtle Avenue Suite 5100  
Brooklyn, NY 11201-4201

Filed electronically

Re: *Michael Stapleton Associates*  
NLRB Case No. 29-CA-230696  
*Michael Stapleton Associates*  
NLRB Case No. 29-RM-266140

Dear Ms. Drew-King:

As counsel to the United Federation of K9 Handlers, the Charging Party in NLRB Case No. 29-CA-230696 and the certified bargaining agent in NLRB Case No. 29-RM-266140, I am writing to provide an update in both cases and to request that the Region reinstate processing NLRB Case No. 29-CA-230696.

As you know, the Federation and MSA entered into a potential settlement agreement in NLRB Case No. 29-CA-230696 contingent upon the employees' ratification of a collective bargaining agreement. The employees overwhelmingly rejected the proposed contract. Thereafter, the law firm that had been representing the Federation in negotiations and in the unfair labor practice case resigned as counsel to the Federation. Federation President Bill Beaury then appointed me as counsel for negotiations and appointed Steve Maritas as the Federation's chief negotiator. When MSA refused to meet with Mr. Maritas, we filed an unfair labor practice charge which was assigned to Region 2. The charge also alleged that MSA was in contact with a group of employees who wanted to negotiate with MSA.

We now believe that negotiation with MSA will not lead to a collective bargaining agreement ratified by the MSA employees. The Federation therefore disclaims the right to represent for collective bargaining purposes the employees for whom it was certified in NLRB Case No. 29-RM-266140. The Federation remains in existence to assist in the litigation of NLRB Case No. 29-CA-230696. With this disclaimer, there is no likelihood of settlement. We urge the Region to proceed with the litigation.

Please contact me with any questions.

Very truly yours,  
/s/ Jonathan Axelrod  
Jonathan G. Axelrod